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Jackson Lewis P.C.
766 Shrewsbury Avenue
Tinton Falls NJ 07724
Tel 732 532-6148
Fax 732 842-0301
www.jacksonlewis.com

James J. Panzini – Resident Managing Principal

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JAMES J. PANZINI
Direct Dial: 732-945-6025
Email: James.Panzini@jacksonlewis.com

POOJA BHUTANI
Direct Dial: 732-945-6026
Email: Pooja.Bhutani@jacksonlewis.com

June 29, 2020

VIA ECF

Hon. Leda D. Wettre
United States Magistrate Judge
for the District of New Jersey

Re: *Reshma Abell v. Pacira Pharmaceuticals, Inc., et al.*
Docket No.: 18-cv-16509 (MCA)(LDW)

Dear Judge Wettre:

This Firm represents Defendants Pacira Pharmaceuticals, Inc., and the remaining individual Defendants, Rich Kahr, Peter Murphy, Glenn Reiser, Dennis McLoughlin, and Paul Ciavolella (hereinafter as, “Defendants”) in the above-captioned matter. We write, jointly with Plaintiff, to provide a status update in advance of the June 29, 2020 status conference, and to respectfully request an extension of the discovery end date from July 31, 2020 to October 31, 2020.

The reason for this request is as follows. As the Court is aware, at the last status conference on April 3, 2020, the parties discussed that Plaintiff would provide Defendants with a settlement demand as well as search terms so that Defendants might complete electronic discovery. Plaintiff provided these terms to Defendants on April 13, 2020. Thereafter, Defendant, through its IT team, implemented the suggested search terms to its relevant files, and this yielded a file size of 96 GB. Due to the voluminous file size, Defendants are required to retain an e-discovery vendor to assist with the processing and review of the files. The vendor has explained that once it processes the data, it will be able to estimate the number of pages the search terms have yielded. Given the file size, it is estimated that Defendants will require approximately sixty days to work with the vendor to process the files, review, and produce same to Plaintiff.



The parties have engaged in continual discussions concerning the production of e-discovery and have agreed that conducting depositions subsequent to the completion of paper discovery would be the most prudent strategy so to avoid potential duplication of effort. As such, the parties are requesting an extension of the discovery end date through October 31, 2019. This extension will allow Defendants to produce the voluminous e-discovery to Plaintiff within sixty days and for the parties to conduct depositions within sixty days thereafter.

Should the Court have any questions or concerns, please do not hesitate to contact the undersigned.

Respectfully submitted,

JACKSON LEWIS P.C.

s/ James J. Panzini

James J. Panzini